



SF Environment

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GAVIN NEWSOM
Mayor

JARED BLUMENFELD
Director

October 6, 2005

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

DOCKET	
04-IEP-1 K	
DATE	OCT - 6 2005
RECD.	OCT - 6 2005

Re: (Docket 04-IEP-1K) Support Proposed Greenhouse Gas Performance Standard Without Offsets

Dear Commissioners,

The San Francisco Department of the Environment is concerned about global warming and has committed to reduce our greenhouse gas emissions, in partnership with ICLEI's Cities for Climate Protection Campaign. The proposed Greenhouse Gas Performance Standard is consistent with the department's policies as well as the Governor's greenhouse gas (GHG) reduction targets. The San Francisco Department of the Environment strongly supports the performance standard, and we urge the Commission to adopt it in the final Integrated Energy Policy Report (IEPR).

The San Francisco Department of the Environment opposes any new commitments to highly carbon intensive power plants, which would lock our residents and businesses into unnecessarily high GHG emissions for decades to come. The proposed GHG performance standard draws a clear line in the sand, communicating to power plant developers that California will only invest in lower-emitting technologies. This policy is urgently needed as conventional coal plants are being planned throughout the west to serve California using outdated and polluting technologies that are clearly incompatible with the state's desired energy future.

Offsets should not be allowed to meet the GHG performance standard, because they would significantly weaken the standard. Offsets would allow the electricity system's emissions to increase while emission reductions are made elsewhere, potentially leaving utility customers financially at risk when a national policy to reduce GHG emissions is adopted. In addition, allowing the use of offsets would substantially slow the development of low-carbon technologies that are so urgently needed.

We support any steps the Commission can take to reduce the GHG emissions associated with our electricity system. The San Francisco Department of the Environment respectfully urges you to adopt the proposed GHG performance standard without allowing the use of offsets.

Sincerely,

Jared Blumenfeld
Director

From: Melissa Capria <Melissa.Capria@sfgov.org>
To: <docket@energy.state.ca.us>
Date: 10/6/2005 3:08:20 PM
Subject: 04 IEP 1K Committee Draft Document Hearings

Please find attached comments from Jared Blumenfeld, Director of the San Francisco Department of Environment, regarding the CEC's proposed GHG performance standard and the use of offsets to meet those standards. Thank you.

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(See attached file: SFE_GHG_Standard_letter.pdf)